

In the matter of RM-10740 I submit my opinions as follows:

1. After doing a tally of the responses this petition appears to me to have been submitted to address a problem that only a small number of HAMS are experiencing, not the whole amateur community. I polled a number of my "HAM" friends and none of them reported any problems with wide bandwidth signals. The FCC should not make new laws to fix a small problem especially when there are appropriate rules already "on the books". I think it more appropriate for hams to either contact the ARRL or an Official Observer about their problems. As I said there are already laws that prohibit wide bandwidths without out putting a precise numerical value on it.

2. I am confused by the petitioners asking for a bandwidth limit of 2.8 kHz. In their document they talked of the defacto standard of 3.0 kHz. that "allows an acceptable quality of voice transmissions and maximizes the number of stations that can fit within the finite limits of the amateur bands". Well if 3.0 kHz was good enough for "fifty years" then why ask for 2.8 kHz? Was this an arbitrary number? A bandwidth of 2.8 kHz is not wide enough!

4. As an Official Observer, I can tell you that, if this rule is enacted it will make our lives much more difficult. Bandwidth is difficult to precisely measure without expensive equipment. As an engineer who has designed radio receivers I believe it will be difficult at best to even come close to determining the occupied bandwidth of a signal with just a state of the art receiver unless a thorough understanding of that receiver's specifications is known. I can see people pointing fingers and arguing about their bandwidths.

"I measure your bandwidth at 2.825 kHz". "No it's not, I checked it and it is 2.79 kHz" "Yes it is", "No it's not". We don't need this in the Amateur Service.

I am a member of the USS Cassin Young Radio club and I worry that I will not be able to operate the World War 2 radio equipment in the AM mode if this is passed.

Please dismiss this petition.

Respectfully  
Bob Callahan, W1QWT